

DON SPRINGMEYER, ESQ. (SBN 1021)
BRADLEY SCHRAGER, ESQ. (SBN 10217)
DANIEL BRAVO, ESQ. (SBN 13078)
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120-2234
Tel.: (702) 341-5200 / Fax: (702) 341-5300
Email: dspringmeyer@wrslawyers.com
Email: bschrager@wrslawyers.com
Email: dbravo@wrslawyers.com

*Attorneys for Plaintiffs Tyus, Hunsicker, Kwayisi,
Jones, Burton, McKinney, Edjeou, and the Class*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATONYA TYUS; DAVID HUNSICKER;
LINDA DAVIS; TERRON SHARP;
COLLINS KWAYISI; LEE JONES; RAISSA
BURTON; JERMEY MCKINNEY; and
FLORENCE EDJEOU, all on behalf of
themselves and all similarly-situated
individuals,

Plaintiffs,

vs.

WENDY'S OF LAS VEGAS, INC.; CEDAR
ENTERPRISES, INC.; and DOES 1 through
100, Inclusive,

Defendants.

Case No: 2:14-cv-00729-GMN-VCF

**STIPULATION AND ORDER TO
VACATE REMAINING DEADLINES**

Plaintiffs Latonya Tyus, David Hunsicker, Collins Kwayisi, Lee Jones, Raissa Burton, Jeremy McKinney, and Florence Edjeou (collectively, "Plaintiffs") and Defendants Wendy's of Las Vegas, Inc. and Cedar Enterprises, Inc. (collectively, "Defendants," and together with Plaintiffs, the "Parties"), by and through their respective counsel of record, hereby notify the Court that the Parties have reached an agreement in principle to settle the entire matter pursuant to a proposed class action settlement, subject to the Court's approval, and to their conferring regarding the drafting and execution of the formal proposed settlement agreement. The Parties

presently intend to file a Motion for Approval of Settlement in approximately thirty (30) days.

Accordingly, the Parties hereby request that all current pleading and discovery deadlines be vacated.

STIPULATION

NOW THEREFORE, the Parties hereby agree and stipulate as follows: The current pleading and discovery deadlines in this matter should be vacated. The Parties shall file a Motion for Approval of Settlement within thirty (30) days.

DATED: May 18, 2020.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

LITTLER MENDELSON, P.C.

By: /s/ Bradley Schrager
DON SPRINGMEYER, ESQ. (SBN 1021)
BRADLEY SCHRAGER, ESQ. (SBN 10217)
DANIEL BRAVO, ESQ. (SBN 13078)
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120-2234
Tel.: (702) 341-5200 / Fax: (702) 341-5300
Email: dspringmeyer@wrslawyers.com
Email: bschrager@wrslawyers.com
Email: dbravo@wrslawyers.com

*Attorneys for Plaintiffs Tyus, Hunsicker,
Kwayisi, Jones, Burton, McKinney, Edjeou,
and the Class*

By: /s/ Rick Roskelley
RICK D. ROSKELLEY, ESQ. (SBN 3192)
ROGER GRANDGENETT II, ESQ. (SBN 6323)
MONTGOMERY Y. PAEK, ESQ. (SBN 10176)
NEIL C. BAKER, ESQ. (SBN 14476)
3960 Howard Hughes Parkway, Suite 300
Las Vegas, Nevada 89169-5937
Tel.: (702) 862-8800 / Fax: (702) 862-8811
Email: rroskelley@littler.com
Email: rgrandgenett@littler.com
Email: mpaek@littler.com
Email: nbaker@littler.com

*Attorneys for Defendants Wendy's of Las Vegas,
Inc. and Cedar Enterprises, Inc.*

ORDER

IT IS HEREBY ORDERED THAT:

The current pleading and discovery deadlines in this matter should be vacated. The Parties shall file a Motion for Approval of Settlement within thirty (30) days.

IT IS SO ORDERED this 20th day of May, 2020.


Cam Ferenbach
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2020, a true and correct copy of **STIPULATION AND ORDER TO VACATE REMAINING DEADLINES** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Melissa Shield

Melissa Shield, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP